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PATRICK J. ANDERSON  
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**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**BUTTE DIVISION**

|                                      |   |                 |
|--------------------------------------|---|-----------------|
| <b>UNITED STATES OF<br/>AMERICA,</b> | <b>CR 11- 9</b>   | <b>-BU- DWM</b> |
| <b>Plaintiff,</b>                    | <b><u>INDICTMENT</u></b>  |                 |
| <b>vs.</b>                           | <b>LABOR UNION EMBEZZLEMENT<br/>(Count I)</b>   |                 |
| <b>TERESA MARIE WILSON,</b>          | <b>Title 29 U.S.C. § 501(c)</b>   |                 |
| <b>Defendant.</b>                    | <b>(Penalty: Five years<br/>imprisonment, \$250,000 fine, and<br/>three years supervised release)</b> |                 |

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|  | <b>BANK FRAUD (Count II)</b><br><b>Title 18 U.S.C. § 1344</b><br><b>(Penalty: 30 years imprisonment,</b><br><b>\$1,000,000 fine, and five years</b><br><b>supervised release)</b><br><br><b>AGGRAVATED IDENTITY THEFT</b><br><b>(Count III)</b><br><b>18 U.S.C. § 1028A(a)(1)</b><br><b>(Penalty: Two years imprisonment</b><br><b>in addition to punishment for</b><br><b>underlying felony, \$250,000 fine,</b><br><b>and one year supervised release)</b> |
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## THE GRAND JURY CHARGES:

### INTRODUCTION

1. At all times material to this Indictment, Plumbers Local Union 41 (Local 41), Butte, Montana, was a labor organization engaged in an industry affecting commerce within the meaning of §§ 402(I) and 402(j) of Title 29, United States Code.

2. At all times material to this Indictment, the Southwestern Montana Central Labor Council (CLC) was an organization of unions in southwest Montana created to unite the various unions to more effectively promote the mission and objectives of organized labor through collaboration and joint activities.

3. At all times material to this Indictment, the Joint Apprenticeship Training Committee (JATC) was a Taft-Hartly Act fund created and funded by Local 41 and the contractors with which it had

collective bargaining agreements, to provide formal and on-the-job training to those entering and learning the plumbing trade.

4. At all times material to this Indictment, the defendant, TERESA MARIE WILSON, was an officer, that is the Secretary, of Local 41, the President of the CLC, and, as Secretary of Local 41, had operational control over the finances of the JATC.

### COUNT I

That from between in or about January 2004, and continuing thereafter until in or about February 2010, at Butte, in the State and District of Montana, the defendant, TERESA MARIE WILSON, while an officer of a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys, funds, securities, property, and other assets of said labor organization, in violation of 29 U.S.C. § 501(c).

### COUNT II

That from between in or about January 2004, and continuing thereafter until in or about February 2010, at Butte, in the State and District of Montana, the defendant, TERESA MARIE WILSON, knowingly executed and attempted to execute a material scheme or artifice to obtain moneys and funds owned by or under the custody and


control of financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), that is, First Citizens Bank of Butte, and Glacier Bank, by means of false or fraudulent pretenses, representations and promises, said scheme being that the defendant, TERESA MARIE WILSON, used a series of bank transactions, diverted deposits, and fraudulent checks, to embezzle funds from Plumbers Local Union 41, the Joint Apprenticeship Training Committee fund, and the Southwestern Montana Central Labor Council, that were in the custody and control of Wells Fargo Bank, in violation of 18 U.S.C. § 1344.

### COUNT III

That from between in or about January 2004, and continuing thereafter until in or about February 2010, at Butte, in the State and District of Montana, the defendant, TERESA MARIE WILSON, did knowingly use, without lawful authority, a means of identification of another person, that is, the names and alleged signatures A.W., L.M., and K.R., during and in relation to a felony violation of 18 U.S.C. § 1344, Bank Fraud, in violation of 18 U.S.C. § 1028A(a)(1).

A TRUE BILL.

  
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FOREPERSON

  
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MICHAEL W. COTTER  
United States Attorney  
Attorney for Plaintiff

  
\_\_\_\_\_  
for KRIS A. McLEAN  
Criminal Chief Assistant U.S. Attorney  
Attorney for Plaintiff

Crim. Summons ☒

Warrant: \_\_\_\_\_

Bail: \_\_\_\_\_

Rtn: in Missoula  
before Magistrate  
Lynch on 4-14-2011  
@ 1:30 pm.